

EXHIBIT A

(IRIS)

LAW OFFICES
BEVERIDGE & DIAMOND, P.C.
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W. R. Grace & Co.
Attn: Lydia B. Duff, Esq.
7500 Grace Drive
Columbia, MD 21044

November 30, 2013
Client/Matter # 01246-015172
Invoice # 157439
Federal ID# 52-1247549

For Legal Services Rendered Through 10/31/13 in Connection With:

IRIS

10/01/13	P. Marks	C300	1.20	Prepare talking points.
10/01/13	P. Marks	C300	0.40	Emails re developments.
10/01/13	P. Marks	C300	0.70	Prepare FOIA appeal issues and emails with team re same, and conference with J. Lanham re same.
10/01/13	D. Barker	C300	1.20	Review information, additional data issues and strategy for response pulmonary function data and strategy for amended or new complaint.
10/01/13	G. Ecolino	C300	0.50	Review and manage file.
10/02/13	P. Marks	C300	1.30	Emails and telephone conferences re talking points.
10/02/13	P. Marks	C300	3.10	Prepare talking points.
10/02/13	J. Lanham	C300	0.30	Telephone conference re documents FOIA.
10/03/13	K. Bourdeau	C300	0.80	Participate in Grace strategy call.
10/03/13	P. Marks	C300	1.00	Prepare for and attend telephone conference with team.
10/03/13	P. Marks	C300	1.30	Collect information and assess new information re strategy.
10/03/13	P. Marks	C300	2.90	Prepare talking points for consultant.

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10/03/13	J. Lanham	C300	1.00	Prepare FOIA appeal.
10/04/13	K. Bourdeau	C300	0.50	E-mail communications with P. Marks re various developments and action items.
10/04/13	P. Marks	C300	1.00	Telephone conference with J. Lanham to assess issues, new information and prepare appeal.
10/04/13	D. Barker	C300	1.70	Review and edit draft amended complaint and follow up on strategy for pursuing additional data.
10/04/13	J. Lanham	C300	4.50	Research and prepare FOIA appeal and communications re same.
10/04/13	J. Lanham	C300	1.50	Prepare amended complaint.
10/07/13	K. Bourdeau	C300	0.50	Conference with P. Marks re strategy.
10/07/13	P. Marks	C300	1.50	Prepare FOIA appeal.
10/07/13	P. Marks	C300	0.50	Assess EPA-related strategic issues and telephone conference with K. Bourdeau re same.
10/07/13	P. Marks	C300	0.80	Telephone conference with H. Feichko, L. Duff, R. Finke and consultants re analysis of studies and follow-up discussion with consultants re same.
10/07/13	J. Lanham	C300	1.50	Prepare FOIA and conference with P. Marks re same.
10/07/13	G. Ecolino	C300	0.50	Review and manage file.
10/08/13	P. Marks	C300	1.00	Telephone conference with H. Feichko and J. Lanham re FOIA appeal to EPA and prepare same.
10/08/13	J. Lanham	C300	4.30	Prepare and file FOIA appeal.
10/08/13	A. Mesmer	C100	1.00	As directed by J. Lanham, cite-check appeal re FOIA response.
10/09/13	K. Bourdeau	C300	0.30	Communications with P. Marks re status update, FOIA request litigation, path forward.
10/09/13	J. Lanham	C300	2.00	Conference with P. Marks and K. Bourdeau re strategy.
10/10/13	G. Ecolino	C300	0.50	Review and manage invoices.
10/11/13	J. Lanham	C300	2.00	Review petition.

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10/13/13	K. Bourdeau	C300	0.50	Review consultant materials re new analysis and communication with P. Marks re same.
10/14/13	J. Lanham	C300	3.00	Review petition and conference with P. Marks re same.
10/14/13	G. Ecolino	C300	0.30	Review and manage file.
10/15/13	P. Marks	C300	0.80	Address FOIA issues and conference with J. Lanham re same.
10/15/13	J. Lanham	C300	1.50	Telephone conferences with government re documents and research re same.
10/16/13	J. Lanham	C300	2.00	Research and prepare letter.
10/17/13	K. Bourdeau	C300	1.00	Conference call with Grace team re strategy and follow-up conference with P. Marks.
10/17/13	P. Marks	C300	0.20	Follow-up coordination with consultants.
10/17/13	P. Marks	C300	1.00	Compile information for and conduct telephone conference with team re EPA issues, and brief follow-up telephone conference with K. Bourdeau re same.
10/18/13	P. Marks	C300	0.30	Telephone conference with L. Duff and H. Feichko re meeting results and next steps.
10/21/13	P. Marks	C300	0.70	Evaluate and prepare FOIA request and email to J. Lanham re same.
10/21/13	J. Lanham	C300	0.20	Email communications and follow-up research.
10/22/13	D. Barker	C300	0.80	Follow up on voicemail from A. Schmitt re response to compromise offer and scheduling questions.
10/23/13	K. Bourdeau	C300	0.80	Conference re preparation for and follow-up with P. Marks re same.
10/23/13	P. Marks	C300	0.60	Telephone conference with client team and consultant re EPA meeting preparation.
10/23/13	J. Lanham	C300	1.00	Telephone conferences with A. Schmitt re litigation and follow-up communications with P. Marks and D. Barker re same.
10/23/13	J. Lanham	C300	4.00	Prepare petition.
10/24/13	K. Bourdeau	C300	1.00	Participate in Grace team conference call.

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10/24/13	P. Marks	C300	1.70	Telephone conference with consultants re recent studies and follow-up review of materials.
10/24/13	P. Marks	C300	1.00	Team weekly telephone conference.
10/25/13	P. Marks	C300	1.40	Assess FOIA litigation issues and conferences with J. Lanham and D. Barker to prepare for telephone conference with client re same.
10/25/13	D. Barker	C300	3.20	Review answer filed by HHS and follow-up re same, conference with J. Lanham and P. Marks re DOJ privacy exemption claims, strategy for request for additional data, and follow up with A. Schmitt re schedule and substance.
10/25/13	J. Lanham	C300	1.00	Conferences with P. Marks, D. Barker, and A. Schmitt re litigation.
10/25/13	G. Ecolino	C300	1.00	Review and manage file.
10/28/13	P. Marks	C300	0.70	Telephone conference with client team, D. Barker and J. Lanham re FOIA litigation strategy.
10/28/13	P. Marks	C300	0.50	Follow-up tasks including contact with consultants and conference with J. Lanham re tasks.
10/28/13	P. Marks	C300	0.50	Telephone conference with consultant re FOIA issues.
10/28/13	D. Barker	C300	1.20	Call with R. Finke and H. Feichko re FOIA litigation strategy and approach.
10/28/13	J. Lanham	C300	2.00	Conferences with client, consultants, Marks and D. Barker re litigation and research re same.
10/28/13	G. Ecolino	C300	0.50	Review and manage file.
10/29/13	P. Marks	C300	1.20	Telephone conference with consultant and J. Lanham re FOIA data formats, and follow-up with J. Lanham re tasks and D. Barker with email summary and briefing schedules.
10/29/13	D. Barker	C300	0.60	Conference with A. Schmitt and call court re case schedule and follow-up with P. Marks and J. Lanham re briefing schedule.
10/29/13	J. Lanham	C300	2.00	Telephone conferences re litigation with A. Schmitt, D. Barker, P. Marks, and consultant.

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10/30/13	P. Marks	C300	1.00	Telephone conference with consultant, L. Duff, H. Feichko re communication with EPA and prepare document re same.
10/30/13	D. Barker	C300	1.20	Follow up on proposed schedule, strategy for settlement proposal, and privacy arguments and facts.
10/31/13	K. Bourdeau	C300	1.30	Participate in Grace team call and follow-up communications.
10/31/13	P. Marks	C300	1.30	Telephone conference with team re developments.
10/31/13	P. Marks	C300	0.80	Telephone conference with L. Duff re tasks and strategy.
10/31/13	P. Marks	C300	0.30	Assist with completion of correspondence.
10/31/13	P. Marks	C300	0.70	Evaluate FOIA issues and appropriate legal standard.
10/31/13	J. Lanham	C300	10.50	Research case law re FOIA Exemption 6 and prepare letter re settlement.

Total Hours : 96.60

Total Fees : \$43,594.50

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	Hours Worked	Billed Per Hour	Bill Amount
K. Bourdeau	6.70	\$750.00	\$5,025.00
P. Marks	31.40	\$545.00	\$17,113.00
D. Barker	9.90	\$445.00	\$4,405.50
J. Lanham	44.30	\$365.00	\$16,169.50
A. Mesmer	1.00	\$205.00	\$205.00
G. Ecolino	3.30	\$205.00	\$676.50

Total Fees :	\$43,594.50
10% Discount :	(4,359.45)
Total Fees Due :	\$39,235.05

Summary by Task Codes :

CODE	Hours	Bill Amount
C100	1.00	\$205.00
C300	95.60	\$43,389.50
Total	96.60	\$43,594.50

Total Fees :	96.60	\$43,594.50
10% Discount :		(4,359.45)
Total Fees Due :		\$39,235.05

Summary by Disbursement Codes :

	Bill Amount
002 Postage	\$0.46
019 Process Servers	\$300.00

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E101	Copying	\$29.40
E105	Telephone	\$6.59
E107	Delivery Services/Messengers	\$15.22
E124	Other	\$1,240.64

Total Disbursements : \$1,592.31

TOTAL DUE : \$40,827.36